

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA

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UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Case No. 23-CR-4019
	)	
v.	)	
	)	
CASSANDRA VONNAHME,	)	MOTION TO CONTINUE TRIAL AND
	)	EXTEND PRETRIAL DEADLINES
Defendant.	)	

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COMES NOW, Defendant, through counsel, and hereby requests that the Court continue the trial and extend the pretrial deadlines, stating:

1. The trial is currently scheduled for May 1, 2023.
2. Defendant appeared and was arraigned on March 1, 2023.
3. The discovery materials are somewhat voluminous, and convoluted, and defendant and counsel need additional time to review the material and prepare for trial. Additionally, defendant's daughter is undergoing treatment for ongoing medical issues which significantly impacts counsel's ability to meet with and interact with defendant to assist in review and preparation of this matter;
4. This is Defendant's first request to continue the trial.
5. Counsel has discussed speedy trial with defendant and Ms. Vonnahme is in agreement a continuance is in her best interest. Defendant is out of custody.
6. Counsel has discussed a continuance with counsel for the Government, Ronald Timmons, who has indicated he has no objection to a firm date in August or September. Undersigned counsel informs the Court he has a scheduling conflict in early August.

7. Defendant requests that the Court continue the trial to late August or September trial period and extend the pretrial deadlines to 30 days prior to trial.

8. The interests of justice in granting this continuance outweigh the interests of the public in a speedy trial. Further, this delay constitutes excludable time under the Speedy Trial Act.

WHEREFORE, Defendant requests that the Court continue the trial and pretrial deadlines in this matter.

/s/ James Nelsen  
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